

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|-----------------------------|---|--------------------------|
| CHICAGOLAND AVIATION, LLC, |) | |
| |) | Case No. 12-cv-1139 |
| Plaintiff, |) | |
| |) | Judge: Ronald A. Guzman |
| |) | |
| |) | Magistrate: Susan E. Cox |
| RICHARD R. TODD, CHICAGO |) | |
| PREMIER BOAT RENTAL AND |) | JURY DEMANDED |
| LEASING, LLC, d/b/a CHICAGO |) | |
| PREMIER FLIGHT TRAINING, |) | |
| |) | |
| Defendants. |) | |

**DEFENDANTS' MOTION FOR ORDER OF COURT TO DIRECT
PLAINTIFF TO PRESERVE DOCUMENTS, EMAILS, SOFTWARE AND THINGS**

Defendants Richard R. Todd and Chicago Premier Boat Rental and Leasing, LLC d/b/a Chicago Premier Flight Training (collectively referred to as "Defendants"), by and through undersigned counsel, move that this Court to issue an Order directing that the documents, emails, software and things be maintained and preserved in their present state, without change or alteration by Plaintiff Chicagoland Aviation, LLC, pending completion of this matter, and in support thereof, state as following:

1. At this time, a preliminary injunction hearing is scheduled for March 1, 2012.
2. Defendants filed a Motion to Expedite Discovery in this matter. (Dkt. No. 20).
3. There may be certain information sought by Defendants that is of a nature such that the information is easily and in some cases may be unintentionally destroyed.
4. For Defendants to prepare and defend adequately and fairly for the hearing in this matter, it is necessary that this Court enter an Order directing that all relevant information be preserved for purposes of discovery.

5. Plaintiffs will not be harmed by such an Order. In contrast, denial of the request to maintain evidence intact will substantially and irreparably harm Defendants.

WHEREFORE, Defendants respectfully request that this Court enter an Order directing Plaintiff, and all other persons or entities within its control or supervision, and all other persons or entities acting in concert with them or on its behalf or participating with, to preserve, maintain, and protect in its present state from destruction, modification or alteration, any and all relevant information.

DATED: February 29, 2012

Respectfully Submitted,

/s/Nicholas S. Lee
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*Attorneys for Defendants Richard R. Todd, and
Chicago Premier Boat Rental and Leasing, LLC,
d/b/a Chicago Premier Flight Training*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on February 29, 2012. Any other counsel of record will be served by electronic mail and/or first class mail.

/s/ Nicholas S. Lee

Nicholas S. Lee